

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

<hr/>)	CASE NUMBER
PATRICK SMITH)	
Plaintiff)	
v.)	JURY TRIAL DEMANDED
)	
BENJAMIN MORRIS)	
Defendant)	JULY 15, 2009
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COMPLAINT

1. Plaintiff seeks relief pursuant to the Fair Debt Collection Practices Act (“FDCPA”), 15 U.S.C. § 1692.

2. The Court has jurisdiction over this matter pursuant to 15 U.S.C. § 1692k, 28 U.S.C. § 1331 and 28 U.S.C. § 1367.

3. Plaintiff, Patrick Smith, is a natural person residing in Windsor, Connecticut.

4. Defendant, Benjamin Morris, is a debt collector within the meaning of the FDCPA.

5. On July 17, 2008, Morris mailed Plaintiff a letter in an effort to collect an alleged debt.

6. Morris falsely stated in the letter to Plaintiff that the company Morris owns, Cuda & Associates, LLC, had purchased the alleged debt.

7. Cuda had not purchased the account on or before July 15, 2008.

FIRST COUNT

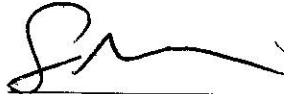
8. Morris’ statement in his July 17, 2008 letter to Plaintiff that Cuda had purchased the debt when it had not was a false statement made in violation of the FDCPA, 15 U.S.C. § 1692e.

9. Morris is liable to Plaintiff for his damages under the FDCPA.

WHEREFORE, Plaintiff seeks such damages as are permitted by law, both compensatory and punitive, including statutory damages of up to \$1,000; costs of suit and a reasonable attorney's fee; declaratory and injunctive relief; and any such other relief as may apply at law or at equity.

PLAINTIFF, PATRICK SMITH

By:



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